

April 21, 2021

VIA ECF AND EMAIL (CronanNYSDChambers@NYSD.USCourts.gov)

The Honorable John P. Cronan
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: **Nisbett v. AMPHP, Inc.**
1:21-CV-02332-JPC

Dear Judge Cronan:

This firm represents Defendant, AMPHP, Inc. in the above-referenced matter. This letter is written pursuant to Rule 3(B) of Your Honor's Individual Practice Rules, to request an extension of the deadline for Defendant to answer, move or otherwise respond to the Complaint from April 22, 2021 through and including June 4, 2021.

Plaintiff consents to this request. This request is being made as our office was recently retained and we would like this additional time to permit us to review and analyze the allegations in Plaintiff's Complaint, speak with pertinent witnesses, review relevant documents, and determine an appropriate response. In addition, the Parties intend on using this time to explore a possible settlement agreement. This is Defendant's first request for an extension of this deadline. No other deadlines have been scheduled in this case.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Joseph J. DiPalma

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